

EXHIBIT “O”

Page 1

IN THE FEDERAL COURT OF
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CIVIL ACTION NUMBER
2:06CV 377-WKW

PIONEER SERVICES, INC.,
Plaintiff,
vs
AUTO OWNERS INSURANCE
COMPANY,
Defendant.

DEPOSITION OF LARRY DEWBERRY

Date: March 21, 2007
Time: 1 p m

COURT REPORTER:
APRIL R. BENDERGER, CSR

Page 2

APPEARANCES

FOR THE PLAINTIFF:

Mr Harry Hall
FARMER, PRICE, HORNSBY & WEATHERFORD
100 Adris Place
Dothan, Alabama 36303

FOR THE DEFENDANT:

Mr Joel Pearson
MORROW, ROMINE & PEARSON
122 South Hull Street
Montgomery, Alabama 36103

Page 3

EXAMINATION INDEX

LARRY DEWBERRY
BY MR HALL

7

CERTIFICATE

120

EXHIBIT INDEX

MAR

Plaintiff's

17 Report

12

Page 4

STIPULATION

IT IS STIPULATED AND AGREED by and
between the parties through their respective
counsel that the deposition of LARRY DEWBERRY
may be taken before April R. Bendinger, Notary
Public, State at Large, at the Law Offices of
Pittman & Perry in Panama City, Florida on March
21, 2007, commencing at approximately 1 p m

IT IS FURTHER STIPULATED AND
AGREED that the signature to and the reading of
the deposition by the witness is waived, the
deposition to have the same force and effect as
if full compliance had been had with all laws
and rules of Court relating to the taking of
depositions

IT IS FURTHER STIPULATED AND
AGREED that it shall not be necessary for any
objections to be made by counsel to any
questions, except as to form or leading
questions and that counsel for the parties may
make objections and assign grounds at the time
of trial or at the time said depositions is
offered in evidence, or prior thereto.

Page 9

1 through to find my copy of it. Here we go.
 2 That it's that you've got in front of you, I
 3 believe. You'll see that it's 150 with a
 4 15-percent clerical and overhead rider. And
 5 some people just prefer a flat charge, so we
 6 also have an alternate rate of 175. If you'll
 7 do the math, you'll see there's about a two or
 8 three dollars an hour difference in those rates.

9 Q. All right. So the charge that I'm
 10 paying today is \$175 per hour for a three-hour
 11 window of time.

12 A. Correct. Or we could do it the
 13 three hours at 150 and 15 percent and it comes
 14 out, I think, about ten dollars less, give or
 15 take a little.

16 Q. All right. And the clerical and
 17 overhead rider, what does that cover?

18 A. That covers things I'm too lazy to
 19 keep up with such as mileage, clerical time,
 20 things like that. It goes on our jobs -- and
 21 that is what we do most of the time is the 150
 22 and 15 percent. Some attorneys prefer just a
 23 flat rate.

Page 11

1 charge for all our time, yes.

2 Q. Which is what you're charging
 3 today; right?

4 A. Correct. And that we charge all
 5 other days.

6 Q. This is the only time Pioneer
 7 Telephone Services, Inc. has ever had to pay
 8 you; is that correct?

9 A. As far as I know, yes.

10 Q. All right. We're not taking this
 11 deposition at your office; is that correct?

12 A. That's correct.

13 Q. Tell me about the first time you
 14 became involved in this matter. And I say,
 15 "this matter", the claim by Pioneer Telephone
 16 Services, Inc. to Auto Owners.

17 A. On December 9, 2004, I was
 18 contacted by Mr. Bill Reaves with Auto Owners
 19 Insurance Company to inspect equipment at
 20 Pioneer Telephone Services related to a
 21 lightning and water claim. We were also
 22 provided with a list of the allegedly damaged
 23 items. The list includes the physical damage to

Page 10

1 Q. Well, today, for purposes of this
 2 deposition, will you be using any clerical
 3 support?

4 A. Well, it doesn't matter. Just
 5 like I'm also not going to be putting on any
 6 long-term mileage. However, on some jobs, I'll
 7 put a lot more mileage than that 15 percent will
 8 take care of, and more clerical than that 15
 9 percent will take care of. So it's an average.
 10 So -

11 Q. Sorry. I thought you were
 12 finished. What about the overhead charge?
 13 We're at an office away from yours.

14 A. That's the same thing. The 15
 15 percent covers everything. But again, it's an
 16 average. Sometimes it's pure profit; sometimes
 17 it doesn't come anywhere near paying what we had
 18 for those items.

19 Q. And your charge for this
 20 deposition today includes charges for the
 21 overhead and the clerical you just described;
 22 right?

23 A. Well, it's the charge we normally

Page 12

1 the building and components reportedly damaged
 2 by lightning or water. There was an enclosure
 3 that had those items.

4 Q. All right

5
 6 (Whereupon, Plaintiff's Exhibit 17
 7 was marked for identification)

8
 9 BY MR. HALL:

10 Q. Let me show you what I'll mark as
 11 Plaintiff's Exhibit 17. I showed you this
 12 before we started the deposition, but can you
 13 tell me what that document is?

14 A. That is my report to Mr. Pearson.

15 Q. Mr. Pearson, who is representing
 16 Auto Owners?

17 A. That is my understanding, yes.

18 Q. Are you -- you were referring to
 19 a document earlier when figuring out the dates
 20 of your contact with Auto Owners and
 21 Mr. Reaves. Is that a part of the report that
 22 is marked as Plaintiff's Exhibit 17?

23 A. Yes. It is actually the

Page 13

1 background section of the report.

2 Q. All right. When Mr. Reaves
3 contacted you, was that the first time that the
4 two of you had spoken?

5 A. That was in 2004. I don't --
6 actually, I don't know. I don't know how long
7 Bill has been with Auto Owners.

8 Q. Is that the first time that the
9 two of you spoke about this claim?

10 A. Yes.

11 Q. Help me understand some of your
12 language so we that can use the same terms.
13 What do you call this file or case or matter?
14 The claim that we're here about today, for your
15 purposes, what do you call it?

16 A. A job.

17 Q. Job. All right. If I say "job",
18 then we're talking about the matters involving
19 Pioneer Telephone Services and their claim for
20 insurance benefits?

21 A. Correct.

22 Q. The first time that you were
23 contacted about this job was the phone call from

Page 14

1 Bill Reaves?

2 A. Yes.

3 Q. And tell me what he sent you after
4 the phone call.

5 A. He sent a fax, which I included as
6 an enclosure of that report. And it's here. It
7 looks like 19 pages, according to the cover
8 sheet.

9 Q. And is that the fax that was dated
10 December 10, 2004, across the top of each of
11 those pages?

12 A. It does have a December 10th date,
13 but the cover page is dated December 9th

14 Q. Well, it was either sent on the
15 9th or the 10th. But either way, it got to you
16 around that time?

17 A. Yes, sir

18 Q. After you received that, what did
19 you do?

20 A. Let's see. We contacted
21 Mr. Williamson, the owner, shortly after we
22 received the assignment. He stated personnel at
23 his insurance agency told him he had permission

Page 15

1 to discard the equipment, and he had done that.
2 Then I contacted Mr. Reaves, told him the
3 equipment was no longer available for
4 inspection. I had no further work on the matter
5 until February 9, 2007.

6 Q. Tell me about the conversation
7 with Jimmy Williamson. You asked him about
8 seeing the equipment?

9 A. First, of course, I'm not going to
10 represent to you that I remember every word of a
11 conversation from three years ago.

12 Q. Yes, sir.

13 A. But the gist of the conversation
14 was that somebody at his insurance agency had
15 told him he had permission to discard the
16 equipment, and he had done that.

17 Q. Was that the first time that you
18 spoke to him?

19 A. I think so.

20 Q. Is that the only time you've
21 spoken with him?

22 A. As far as I remember

23 Q. Did you ask him any questions

Page 16

1 other than, "Can I see the equipment"? And I'm
2 paraphrasing that

3 A. Again, I'm not representing to you
4 that I remember every word of the conversation,
5 but the gist of it is what I've answered.

6 Q. Did you ask him for any other
7 information after that?

8 A. Again, I'm not going to represent
9 that I remember every word of the conversation,
10 but the gist of it is what we talked about

11 Q. Well, by topic if nothing else.

12 I'm not asking you to quote the words you said
13 What I'm trying to find out is: Is there any
14 other information you requested from
15 Mr. Williamson after he told you about what you
16 said, that his agent had told him he could throw
17 it away and that the equipment was not
18 available?

19 A. And again, I cannot remember every
20 word of the conversation from 2007, but this is
21 the gist of what we talked about

22 Q. Well, do your records or the gist
23 of what you talked about bring to your

FRANKLIN ENGINEERING

Franklin Technical Services, Inc.

800-433-8539

(850) 763-2905
Fax (850) 872-8080
P.O. BOX 15894
PANAMA CITY, FL 32406

February 13, 2007

Morrow, Romine & Pearson
P. O. Box 4804
Montgomery, AL 36103-4804

Attention: Mr. J. Pearson

Re: Pioneer Services, Inc. v.
Auto-Owners Insurance Co
Your File: 2:06-CV-377-WKW
Franklin File: 104289

Dear Mr. Pearson,

Complying with your instructions on February 9, 2007, we reviewed documents associated with the above referenced action for the purpose of technically evaluating the allegedly damaged items.

BACKGROUND

On December 9, 2004, we were contacted by Mr. Bill Reaves with Auto-Owners Insurance Company to inspect equipment at Pioneer Telephone Services related to a lightning and water claim. We were also provided with a list of the allegedly damaged items. The list includes the physical damage to the building and components reportedly damaged by lightning or water (see Enclosure 1)

INSPECTION

We contacted Mr. Williams, the owner, shortly after we received the assignment. He stated personnel at his insurance agency told him he had permission to discard the equipment and he had done that. We contacted Mr. Reaves and told him the equipment was no longer available for inspection. We had no further work on the matter until you contacted us on February 9, 2007. On February 12, 2007, we received a CD with PDF files of various documents filed in the action (see Enclosure 2). The documents include a lightning scan that indicates that at the alleged time of the loss, no lightning activity

**PLAINTIFF'S
EXHIBIT**

17

FRANKLIN ENGINEERING

Page 2

104289

was present within 5 miles of the facility. The documents also indicate the plaintiffs determined the equipment was damaged by lightning after visually inspecting the equipment and by the way the equipment smelled.

DISCUSSION

The claim has two parts. Apparently, one part of the claim alleges lightning damaged equipment in use at the facility. Obviously, the equipment could not have been damaged by lightning if no lightning activity was present within a 5-mile radius of the location of the equipment. Since we were unable to inspect the equipment, we were unable first to confirm the existence of the equipment, and second, if the equipment existed, we were unable to confirm that it was damaged. If we assume the equipment failed at the same time, the failure could be due to an outside influence, such as a voltage transient. However, voltage transients are virtually always generated off premises on the primary side of the transformer.

The second part of the claim alleges equipment in storage was damaged by water. The equipment consists of electronic circuit boards used in telephone systems. Again, we were unable to verify the existence of the equipment. However, if we assume the equipment existed and it was contained in the boxes normally used to ship that equipment, the normal mode for packing that type equipment would dictate that the equipment inside the boxes was itself contained in plastic or foil bags, making it impervious to water exposure. The fact that the cardboard boxes were waterstained does not render the equipment inside the box unusable. However, even if we assume the equipment was exposed to water, electronic equipment that is not energized is rarely damaged by exposure to fresh water. Obviously, the equipment could have been tested by its respective manufacturers. Manufacturers usually have an exchange program that allows them to receive boards that are reportedly not operational and for a fee, they can exchange them for new or rebuilt boards.

CONCLUSIONS

All the equipment was reportedly discarded before the matter could be resolved. At the time of the alleged loss, no lightning activity was present within 5 miles of the facility. The alleged damage to the stored equipment was limited to relatively minor exposure to water while the equipment was contained in the manufacturers' shipping boxes.

FRANKLIN ENGINEERING

Page 3

104289

OPINION

It is our opinion the equipment in use at the facility at the time of the alleged loss was not damaged by lightning. It is also our opinion that if the reportedly stored equipment was contained in the usual boxes provided by the manufacturer and the equipment contained in the boxes was packed in a manner that is customary for the manufacturer, the equipment would not have been damaged by water. It is further our opinion that electronic equipment that is not energized does not usually sustain damage when exposed to fresh water.

Sincerely,

Franklin Engineering

Larry F. Dewberry

Larry F. Dewberry, P.E.

2/13/07

Dec-10-2004 05:36am From-

T-446 P 001 F-558

AUTO-OWNERS INSURANCE COMPANY
AUTO-OWNERS LIFE INSURANCE COMPANY
HOME-OWNERS INSURANCE COMPANY
OWNERS INSURANCE COMPANY
PROPERTY-OWNERS INSURANCE COMPANY
SOUTHERN-OWNERS INSURANCE COMPANY



BRANCH CLAIM OFFICE
5915 Carmichael Road • P.O. Box 244017
Montgomery, Alabama 36124-4017
334-279-0323 FAX 334-271-0481
WWW.AUTO-OWNERS.COM

CLAIMS FAX TRANSMISSION

DATE: 12/9/04

Number of pages including cover sheet 19

TO: FAX # ()

TO: LARRY Dewberry

Attention: _____

FROM: AUTO-OWNERS INSURANCE COMPANY

BY: Bill Reeves

SUBJECT: 37-4873-04

Remarks: New Assignment we spoke about

The information contained in this facsimile message is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be an attorney-client or work product communication and is privileged and confidential. If you have received this communication in error, please notify us immediately by telephone and return the original message to us by mail. Any review, dissemination, distribution or copying of this message by any person other than the intended recipient(s) or their authorized agents is strictly prohibited. Thank you.

PLEASE CALL SENDER IF ANY PAGES ARE MISSING OR UNCLEAR

Dec-10-2004 06:36am From-

T-446 P 002 F-558

AUTO-OWNERS INSURANCE COMPANY
AUTO-OWNERS LIFE INSURANCE COMPANY
HOME-OWNERS INSURANCE COMPANY
OWNERS INSURANCE COMPANY
PROPERTY-OWNERS INSURANCE COMPANY
SOUTHERN-OWNERS INSURANCE COMPANY



P.O. Box 244017 (CLAIMS)
Montgomery, Alabama 36124
PHONE (334) 279-0323
FAX (334) 271-0481

December 9, 2004

Mr. Larry Dewberry

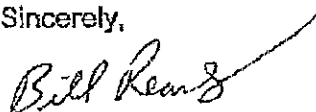
RE: 37-4873-04

Dear Larry:

Enclosed is a copy of the information our insured Pioneer Telephone Services are claiming that was damaged during the Hurricane. Damage alleged are lightning to the phone system that was in use in the insured's business. Also he is claiming that water entered the building in the storeroom and got spare parts for phone systems wet which rendered them unusable. Please inspect to verify the damages. The contact is Jimmy Williamson 334-222-8777. The location is P.O. Box 548 Andalusia, AL 36420.

Thank you for your time and consideration in this matter. If you need any further assistance, please give me a call at 1-800-548-9881 ext. 204.

Sincerely,



Bill Reaves
Field Claim Rep.

Dec-10-2004 06:36am From-

T-446 P 003 F-558

INVOICEInvoice Number:
133533Invoice Date:
Oct 29, 2004Page:
1

Pioneer Telephone Services, Inc.
P. O. Box 1606
Andalusia, AL 36420-1227

Voice: 334-222-8777
 Fax: 334-222-8458

Sold To:

Pioneer Telephone Services, Inc.
 P. O. Box 1606
 Andalusia, AL 36420-1227

Ship to:

Claim # 037-0004873-2004

Customer ID		Customer PO		Payment Terms	
2228777				Net 10 Days	
Sales Rep ID		SO# / Date		SC Date	Due Date
JRW		9/27/04			11/8/04
Quantity	Item	Description		Unit Price	Extension
		EQUIPMENT IN WAREHOUSE WATER			
		DAMAGED BY IVAN'S STORMS			
1.00	SX50	MITEL CABINET			
1.00	SX50PS	MITEL SX50 POWER SUPPLY			
1.00	9102-018-000	MITEL CONSOLE			
1.00	9110-211-000	MITEL 4 TRK CIR CARD			
2.00	9104-020-001SA	16 CT STA CARD			
1.00	NSCICS	NS CICS KSU			
13.00	T7100B	NORSTAR SINGLE LINE BLACK			
2.00	T7100	PLATINUM SINGLE-LINE			
7.00	T7208B	CHARCOAL 8-BUTTON KEYSET			
6.00	T7316B	CHARCOAL 16-BUTTON PHONE			
20.00	2831-00	4X8 CO KEY STATION BOARD			
1.00	2830-16	CPU/VCM PROCESSOR			
27.00	1414-08	EXECUTIVE DISPLAY SPEAKERPHONE			
12.00	1412-08	ENHANCED SPEAKERPHONE			
1.00	SP4000-00	BKSU (BASIC KSU)			
1.00	SP4074-00	DCU			
7.00	SP4032-00	KIB BOARD			

Subtotal

Continued

Sales Tax

Continued

Total Invoice Amount

Continued

Payment Received

TOTAL

Continued

Check No:

A finance charge of 1 1/2% will be added on invoices more than 10 days overdue.

Dec-10-2004 06:36am From:

T-446 P 004/019 F-559

Pioneer Telephone Services, Inc.
P. O. Box 1606
Andalusia, AL 36420-1227

Voice: 334-222-8777
 Fax: 334-222-8458

INVOICE
 Invoice Number:
 13383B
 Invoice Date:
 Oct 29, 2004

Page:
 2

Sold To:

Pioneer Telephone Services, Inc.
 P.O. Box 1606
 Andalusia, AL 36420-1227

Ship to:

claim # 037-0004873-2004

Customer ID		Customer PO		Payment Terms	
2228777				Net 10 Days	
Sales Rep ID		SO# / Date		SC Date	Due Date
JRW		9/27/04			11/8/04
Quantity	Item	Description		Unit Price	Extension
1.00	SP4031-00	COB BOARD			
1.00	SP4030-00	CPB			
1.00	SP4033-00	SIB BOARD			
1.00	SP4035-00	APL			
9.00	612 1000	GLX-12 KSU			
22.00	612 3201	GLX STD KEYSET			
1.00	CD616	COMDIAL 616 KSU			
1.00	DCDSS	COMDIAL ESS			
17.00	6600E	COMDIAL KEYSET			
6.00	6714X-PG	COMDIAL KEYSET			
13.00	6714V-PG	COMDIAL KEYSET			
9.00	6614E-PG	COMDIAL KEYSET			
1.00	6614T-PG	COMDIAL KEYSET			
1.00	6714S	Comdial Keyset			
1.00	CD820	COMDIAL 820 KSU			
1.00	E80	ESOPT KSU			
2.00	40016	STATION CARD			
1.00	CDOPX	COMDIAL 2-PORT OPX			
4.00	6706X-PG	COMDIAL KEYSET			

Subtotal

Continued

Sales Tax

Continued

Total Invoice Amount

Continued

Payment Received

TOTAL

Continued

Check No:

A finance charge of 1 1/2% will be added on invoices more than 10 days overdue.

Dec-10-2004 06:37am From:

T-446 P 005/018 F-558

INVOICE

Pioneer Telephone Services, Inc.
P. O. Box 1606
Andalusia, AL 36420-1227

Invoice Number:
 133838

Invoice Date:
 Oct 29, 2004

Voice: 334-222-8777
 Fax: 334-222-8458

Page:
 3

Sold To:

Ship to:

Pioneer Telephone Services, Inc.
 P.O. Box 1606
 Andalusia, AL 36420-1227

claim #037-0004873-2004

Customer ID		Customer PO		Payment Terms	
2228777				Net 10 Days	
Sales Rep ID		SO# / Date		SC Date	Due Date
JHW		9/27/04			11/8/04
Quantity	Item	Description		Unit Price	Extension
1.00	6702X-PG	COMDIAL KEYSET			
2.00	6714FB	COMDIAL KEYSET			
1.00	6620PB	COMDIAL KEYSET			
1.00	W3KMEM95-57	PG COMDIAL HANDSET			
3.00	PCB	OMEGA PCB BOARD			
1.00	ANA	OMEGA ANA CARD			
2.00	ICM	OMEGA ICM CARD			
6.00	XPS	OMEGA XPS-1 CARD			
5.00	SUB	OMEGA SUB CARD			
2.00	COT	OMEGA COT CARD			
1.00	CPU	OMEGA CPU CARD			
1.00	B16/2460	OMEGA KEYSET			
7.00	60025	TIE KEYSET			
5.00	60001	TIE KEY SERVICE UNIT			
2.00	60002	4 CRT C.O. LINE CARD			
1.00	60010	TIE 1 PORT CO MODULE			
8.00	THANDSET	TIE HANDSET			
1.00	TP1648DCDC	TEL-PLUS 1648DCDC CONVERTER			
6.00	TPHANDSET	TEL-PLUS HANDSET			

Subtotal

Continued

Sales Tax

Continued

Total Invoice Amount

Continued

Payment Received

TOTAL

Continued

Check No:

A finance charge of 1 1/2% will be added on invoices more than 10 days overdue.

Dec-10-2004 08:37am From:

T-446 P 006/010 F-558

INVOICE

Invoice Number:

13383B

Invoice Date:

Oct 29, 2004

Page:

4

Pioneer Telephone Services, Inc.**P. O. Box 1606****Andalusia, AL 36420-1227**

Voice: 334-222-8777

Fax: 334-222-8458

Sold To:

Pioneer Telephone Services, Inc.

P.O. Box 1606

Andalusia, AL 36420-1227

Ship to:

Claim # 037-0004873-2004

Customer ID		Customer PO		Payment Terms	
2228777				Net 10 Days	
Sales Rep ID		SO# / Date		SC Date	Due Date
JHW		9/27/04			11/8/04
Quantity	Item	Description	Unit Price	Extension	
1.00	TP1648PS	TEL-PLUS POWER SUPPLY			
2.00	TP1648SIB	TEL-PLUS SIB CARD			
3.00	TP1648KIB	TEL-PLUS 1648 KIB CARD			
2.00	TP1648COB	TEL-PLUS 1648 COB CARD			
1.00	TP1648CNB	TEL-PLUS 1648 CNB CARD			
1.00	TP1648TNB	TEL-PLUS 1648 TNB CARD			
1.00	TP1648SCB	TEL-PLUS 1648 SCB CARD			
2.00	TP816PM	TEL-PLUS 816 PROGRAM MODULE			
6.00	TP1648	TELPLUS 1648 KEYSET SM LCD			
1.00	TP1648DSS	TEL-PLUS 1648 DSS			
5.00		ATT 24 BUTTON KEYSET			
1.00	ATTML308	ATT MERLIN 308 KSU			
1.00	ACS704A	ATT POWER SUPPLY			
1.00	ATTSP616	ATT SPIRIT EXP 616 KSU			
3.00		ATT SURGE PROTECTOR			
2.00		ATT AC PROTECTOR			
1.00	EQUIPMENT	TOTAL EQUIPMENT	34,915.53	34,915.53	

Subtotal 34,915.53

Sales Tax

Total Invoice Amount 34,915.53

Payment Received

TOTAL 34,915.53

Check No:

A finance charge of 1 1/2% will be added on invoices more than 10 days overdue

Dec-10-2004 06:37am From:

T-446 P 007/019 F-558

4

4

PIONEER TELEPHONE SERVICES, INC.

P.O. Box 1606

Andalusia, Alabama 36420-1227

claim #037-0004873-2004

LIGHTNING AFFIDAVIT

I, James H. Williamson, do certify that I have this 20th day of September, 2004, examined the following item(s):

Qty. 1	Item Description Mitel Cabinet	Part # SX50
Qty. 1	Item Description Mitel SX50 Power Supply	Part # SX50PS
Qty. 1	Item Description Mitel Console	Part # 9102-018-000
Qty. 1	Item Description Mitel 4 Trk Cir Card	Part # 9110-211-000
Qty. 2	Item Description 16 Ct Station Card	Part # 9104-020-001SA
Qty. 1	Item Description NS CICS KSU	Part # NSCICS
Qty. 13	Item Description Norstar Single-line Black	Part # T7100B
Qty. 2	Item Description Norstar Single-line Platinum	Part # T7100
Qty. 7	Item Description Norstar 8-Button Keypad Charcoal	Part # T7208B
Qty. 6	Item Description Norstar 16-Button Keypad Charcoal	Part # T7316B
Qty. 20	Item Description 4x8 CO Key Station Board	Part # 2831-00
Qty. 1	Item Description CPU/VCM Processor	Part # 2830-16

Dec-10-2004 06:37am From-

T-446 P 008/018 F-558

1

1

2

claim# 037-0004873-2004

Qty. 27	Item Description Executive Speakerphone	Part # 1414-08
Qty. 12	Item Description Enhanced Speakerphone	Part # 1412-08
Qty. 1	Item Description BKSU (Basic KSU)	Part # SP4000-00
Qty. 1	Item Description DCU	Part # SP4074-00
Qty. 7	Item Description KIB Board	Part # SP4032-00
Qty. 1	Item Description COB Board	Part # SP4031-00
Qty. 1	Item Description CPB	Part # SP4030-00
Qty. 1	Item Description SIB Board	Part # SP4033-00
Qty. 1	Item Description APL	Part # SP4035-00
Qty. 9	Item Description GLX-12 KSU	Part # 612.1000
Qty. 22	Item Description GLX Std. Keyset	Part # 612.3201
Qty. 1	Item Description Comdial 616 KSU	Part # CD616
Qty. 1	Item Description Comdial DSS	Part # DCDSS
Qty. 17	Item Description Comdial Keyset	Part # 6600E
Qty. 6	Item Description Comdial Keyset	Part # 6714X-PG

Dec-10-2004 08:38am From-

T-446 P.009/019 F-558

claim# 0370004873-2004

Qty. 13	Item Description Comdial Keypad	Part # 6714V-PG
Qty. 9	Item Description Comdial Keypad	Part # 6614E-PG
Qty. 1	Item Description Comdial Keypad	Part # 6614T-PG
Qty. 1	Item Description Comdial Keypad	Part # 6714S
Qty. 1	Item Description Comdial 820 KSU	Part # CD820
Qty. 1	Item Description E80PT KSU	Part # E80
Qty. 2	Item Description Station Card	Part # M0016
Qty. 1	Item Description Comdial 2-Port OPX	Part # CDOPX
Qty. 4	Item Description Comdial Keypad	Part # 6706X-PG
Qty. 1	Item Description Comdial Keypad	Part # 6702X-PG
Qty. 2	Item Description Comdial Keypad	Part # 6714FB
Qty. 1	Item Description Comdial Keypad	Part # 6620PB
Qty. 1	Item Description Comdial Handset	Part # W3KMEM95-57
Qty. 3	Item Description Omega PCB Board	Part # PCB
Qty. 1	Item Description Omega ANA Card	Part # ANA

Dec-10-2004 06:38am From:

T-446 P 010/018 F-558

14

Claim #037-0004873-2004

Qty. 2	Item Description Omega ICM Card	Part # ICM
Qty. 6	Item Description Omega XPS-1 Card	Part # XPS-1
Qty. 5	Item Description Omega SUB Card	Part # SUB
Qty. 2	Item Description Omega COT Card	Part # COT
Qty. 1	Item Description Omega CPU Card	Part # CPU
Qty. 1	Item Description Omega Keyset	Part # 816/2460
Qty. 7	Item Description Tie Keyset	Part # 60025
Qty. 5	Item Description Tie Key Service Unit	Part # 60001
Qty. 2	Item Description 4 Ckt C O Line Card	Part # 60002
Qty. 1	Item Description Tie 1 Port CO Module	Part # 60010
Qty. 8	Item Description Handset	Part # Thandset
Qty. 1	Item Description Tel-Plus 1648DCDC Converter	Part # TP1648DCDC
Qty. 6	Item Description Tel-Plus Handset	Part # TPhandset
Qty. 1	Item Description Tel-Plus Power Supply	Part # TP1648PS
Qty. 2	Item Description Tel-Plus SIB Card	Part # TP1648SIB

Dec-18-2004 05:38am from-

T-446 P 011/019 F-558

¹ Claim # 037-0004873-2004 ¹ 5

Qty. 3	Item Description Tel-Plus KIB Card	Part # TP1648KIB
Qty. 2	Item Description Tel-Plus COB Card	Part # TP1648COB
Qty. 1	Item Description Tel-Plus CNB Card	Part # TP1648CNB
Qty. 1	Item Description Tel-Plus TNB Card	Part # TP1648TNB
Qty. 1	Item Description Tel-Plus SCB Card	Part # TP1648SCB
Qty. 2	Item Description Tel-Plus 816 Program Module	Part # TP816PM
Qty. 6	Item Description Tel-Plus 1648 Keyset	Part # TP1648
Qty. 1	Item Description Tel-Plus 1648 DSS	Part # TP1648DSS
Qty. 5	Item Description ATT 24 Button Keyset	Part #
Qty. 1	Item Description Merlin 308 KSU	Part # ATTML308
Qty. 1	Item Description ATT Power Supply	Part # ACS704A
Qty. 1	Item Description ATT Spirit Exp 616 KSU	Part # ATTSP616
Qty. 3	Item Description ATT Surge Protector	Part #
Qty. 2	Item Description ATT AC Protector	Part #

Dec-10-2004 06:38am From-

T-446 P 012/019 F-558

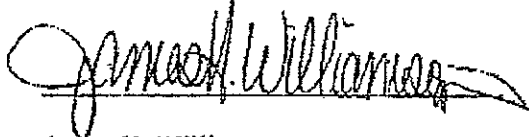
1

Claim # 037-0004873-2004

6

Belonging to: Pioneer Telephone Services, Inc.

I further certify that to the best of my knowledge the above described property was damaged by water because of damage done to the printed circuit boards in the above equipment.



James H. Williamson
Pioneer Telephone Services, Inc.

Dec-18-2004 08:38am From:

T-446 P 013/018 F-558

Pioneer Telephone Services, Inc.
P. O. Box 1606
Andalusia, AL 36420-1227

Voice: 334-222-8777
 Fax: 334-222-8458

INVOICE
 Invoice Number:
 13383

Invoice Date:
 Oct 29, 2004

Page:
 1

Sold To:
 Pioneer Telephone Services, Inc
 P.O. Box 1606
 Andalusia, AL 36420-1227

Ship to:

Claim # 037-0004873-2004

Customer ID		Customer PO		Payment Terms	
2228777				Net 10 Days	
Sales Rep ID		SO# / Date		SC Date	Due Date
JHW		9/27/04			11/8/04
Quantity	Item	Description		Unit Price	Extension
		LIGHTNING DAMAGE DONE DURING			
		HURRICAN IVAN'S STORMS. REPLACED			
		EQUIPMENT AND TESTED.			
1.00	LABOR	LABOR		2,410.00	2,410.00
1.00	EQUIPMENT	TOTAL EQUIPMENT		17,746.04	17,746.04
1.00	NS19404	NORSTAR MODULAR ICS KSU 0X32			
1.00	NS19405	NORSTAR MICS 6.0 SOFTWARE			
1.00	NS19419	NORSTAR CALLER ID TRK CTG			
1.00	M7324	24 Button Keypad w/Display			
3.00	T7316B	CHARCOAL 16-BUTTON PHONE			
3.00	T7208B	CHARCOAL 8-BUTTON KEYPAD			
1.00	VISTA-20P	V20P ATTACK PACK W/6160			
1.00	SDX16CS0GB	DIGITAL SPRITE SYSTEM			
2.00	AO\38\000000001K5291	1/3" COLOR DIGITAL CAM 350TVL			
2.00	EO-63-13VG550S	1/3" 5-50mm VARIOFAL LENSE			
2.00	PE-ZH3512MI	EH3512 W/EM1450 MOUNT			
1.00	LO\ST\00000000PS241	CCTV POWER SUPPLY			
1.00	FMA	OUTDOOR FM OMNI ANTENNA			
1.00		TELEVISION ANTENNA AMPLIFIER			

Check No:

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment Received	
TOTAL	Continued

A finance charge of 1 1/2% will be added on invoices more than 10 days overdue.

Dec-10-2004 05:38am From-

1-446 P.014/019 F-359

Pioneer Telephone Services, Inc.**P. O. Box 1606****Andalusia, AL 36420-1227**

Voice: 334-222-8777

Fax: 334-222-8458

INVOICE

Invoice Number:

13383

Invoice Date:

Oct 29, 2004

Page:

2

Sold To:

Pioneer Telephone Services, Inc.
P.O. Box 1606
Andalusia, AL 36420-1227

Ship to:

Claim # 037-0004873-2004

Customer ID		Customer PO		Payment Terms	
2228777				Net 10 Days	
Sales Rep ID		SO# / Date		SC Date	Due Date
JHW		9/27/04			11/8/04
Quantity	Item	Description		Unit Price	Extension
1.00	TELESCOPIC MAST	30' TV ANTENNA POLE			
1.00		SANYO 4-HEAD HI-FI-VCR			
1.00	ONK-TX-DS797	THX SELECT RECEIVER			
1.00	ONK-IX-8S11	STEREO RECEIVER			
1.00		DELL COMPUTER SYSTEM (FLAT PANEL 17", KEYBOARD, HARD DRIVE, PRINTER)			
1.00		DELL INSPIRON LAPTOP, 17" FLAT PANEL DISPLAY, PORT REPLICATOR, PRINTER			
1.00		GATEWAY COMPUTER SYSTEM (MONITOR, KEYBOARD, HARD DRIVE)			
1.00	NS900MEZ	NORSTAR 900 MHZ CORDLESS PHONE			
1.00	ENCORE 8	SUBWOOFER			

Subtotal 20,156.04

Sales Tax 1,419.68

Total Invoice Amount 21,575.72

Payment Received

TOTAL 21,575.72

Check No:

A finance charge of 1 1/2% will be added on invoices more than 10 days overdue.

Dec-10-2004 06:39:28 From-

T-446 P 015/010 F-558

1

1

PIONEER TELEPHONE SERVICES, INC.

P.O. Box 1606

Andalusia, Alabama 36420-1227

Claim # 037-0004873-2004
 LIGHTNING AFFIDAVIT

I, James H. Williamson, do certify that I have this 20th day of September, 2004, examined the following item(s):

Qty.	Item Description	Part #
1	Norstar Modular ICS KSU 0x32	NS19404
1	Norstar Mics 6.0 Software	NS19405
1	Norstar Caller ID Trk Cartridge	NS19419
1	24 Button Keypad w/ Display	M7324
3	16 Button Keypad	T7316B
2	8 Button Keypad	T7208B
1	V20P Attack Pack w/6160	Vista-20P
1	Digital Sprite System	DSDX16C80GB
2	1/3" Color Digital Cam 350 TVL	AO38\0001K629A
2	1/3" 5.50mm Varifocal Lense	EO-63-13VG550S
2	EH3512 w/EM1450 Mount	PE-EH35212MT
1	CCTV Power Supply	LO\ST\000PS2416

Dec-10-2004 06:39am From-

T-446 P 016/018 F-558

1

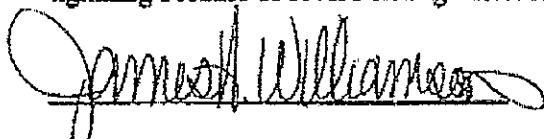
2¹

Qty. 1	Item Description Outdoor FM Omni Antenna	Part # FMA
Qty. 1	Item Description Television Antenna Amplifier	Part #
Qty. 1	Item Description 30' TV Antenna Pole	Part # Telescopic Mast
Qty. 1	Item Description Sanyo 4-Head Hi-Fi VCR	Part #
Qty. 1	Item Description THX Select Receiver	Part # ONK-TX-DS797
Qty. 1	Item Description Stereo Receiver	Part # ONK-TX-8511
Qty. 1	Item Description Dell Computer System	Part #
Qty. 1	Item Description Dell Inspiron Laptop	Part #
Qty. 1	Item Description Gateway Computer System	Part #
Qty. 1	Item Description Norstar 900Mhz Cordless Phone	Part # NS900MHZ
Qty. 1	Item Description Subwoofer	Part # Encore 8

claim # 037-0004873-2004

Belonging to: Pioneer Telephone Services, Inc

I further certify that to the best of my knowledge the above described property was damaged by lightning because of severe damage done to the printed circuit boards in the above equipment.



James H. Williamson
Pioneer Telephone Services, Inc.

Claim #037-004873-2004

LAW OFFICES

MORROW, ROMINE & PEARSON, P.C.

122 SOUTH HULL STREET
POST OFFICE BOX 4804
MONTGOMERY, ALABAMA 36103-4804
WEBSITE: WWW.MRPLAW.COM
WRITER'S EMAIL ADDRESS: JEP@PEARSONSMRPLAW.COM

TELEPHONE: (334) 262-7707
FACSIMILE: (334) 262-7742

ROGER S. MORROW
WESLEY ROMINE
JOEL H. PEARSON
R. WILL HOLMES

February 9, 2007

Mr. Larry Dewberry
2201-G Grant Avenue
Panama City, Florida 32405

RE: Pioneer Services, Inc., v. Auto-Owners Insurance Company, et al., In the United States District Court for the Middle District of Alabama, Northern Division, Civil Action No : 2:06-cv-377-WKW

Dear Larry:

Thank you for speaking with me recently regarding the above-referenced matter. I am enclosing for your review a disk containing the following documents:

- 1) Plaintiff's Amended Complaint
- 2) Defendant's Amended Answer
- 3) Plaintiff's Disclosure of Expert Testimony
- 4) AO Bates Stamped pages AO00001 to AO00299
- 5) Pioneer Bates Stamped pages Pioneer 0001 to Pioneer 0357
- 6) The deposition of Harold Young
- 7) The deposition of John Tomberlin
- 8) Interrogatories to Plaintiffs by South Central Agency
- 9) Answers to Defendant, South Central Agency, Inc.'s Interrogatories to Plaintiffs
- 10) Defendant Auto-Owners Insurance Company's First Interrogatories to Plaintiffs

4

4

February 9, 2007

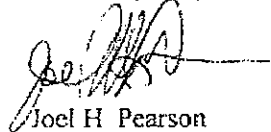
Page 2

- 11) Answers to Defendant, Auto-Owners Insurance Company, Inc.'s Interrogatories to Plaintiffs
- 12) Supplemental Answers to Defendant, Auto-Owners Insurance Company's Inc.'s Interrogatories to Plaintiffs

Please advise me if you believe you need additional information in order to review this matter and to discuss your possible expert testimony on behalf of Auto-Owners with us. I will forward you copies of transcripts of additional depositions as they are received.

With best personal regards, I remain

Yours very truly,



Joel H. Pearson

JHP/djh
enclosures

FRANKLIN
ENGINEERING

Franklin Technical Services, Inc

600-433-8539

(850) 763-2905
Fax (850) 872-8080
P.O. BOX 15894
PANAMA CITY FL 32406

February 13, 2007

Morrow, Romine & Pearson
P. O. Box 4804
Montgomery, AL 36103-4804

Attention: Mr. J Pearson

Re: Pioneer Services, Inc. v.
Auto-Owners Insurance Co.
Your File: 2:06-CV-377-WKW
Franklin File: 104289

Dear Mr. Pearson,

This is an invoice for professional services provided to your company regarding the above referenced file. Please use Federal ID# 59-3000656 for your records.

If, after 3 months from the date of this invoice, we have not received payment, a 4% interest charge will be added to the invoice total each month the invoice remains unpaid.

The following is an itemized list of charges:

Professional Engineer for 10 hours at \$150/hour	\$1,500.00
15% Overhead and clerical fee	\$ 225.00
Total Due	\$1,725.00

Thank you

Sincerely,

Larry F. Dewberry

Larry F. Dewberry

FRANKLIN ENGINEERING

Franklin Technical Services, Inc.

800-433-8539

(850) 763-2905
Fax (850) 872-8080
P.O. BOX 15934
PANAMA CITY, FL 32408

February 13, 2007

Morrow, Romine & Pearson
P. O. Box 4804
Montgomery, AL 36103-4804

Attention: Mr. J. Pearson

Re: Pioneer Services, Inc. v.
Auto-Owners Insurance Co.
Your File: 2:06-CV-377-WKW
Franklin File: 104289

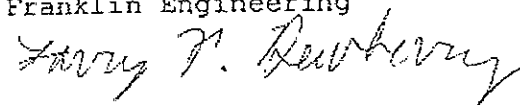
Dear Mr. Pearson,

We are providing you with a rate schedule for our services. We charge \$150.00 per hour for all Professional Engineering services, including time involved in travel, inspection, report preparation, and court appearance if required. We also have a 3-hour minimum charge on all assignments, including depositions and court appearances. Our charges also include photography expenses for photographs included in our report(s). Photograph charges for the first copy of our report are \$1.50 per print, and if additional copies of the report are requested before the report is completed, the additional photographs in those reports are \$1.25 per print. After the report has been completed, additional copies of the photographs are \$2.00 per print. In some inspections, such as fire cause and origin, laboratory analysis of debris is necessary. In that case, the laboratory analysis fee is included. We also charge a 15% clerical and overhead rider on the engineering, photography, laboratory, and other expenses. An alternate rate of \$175.00 per hour without the clerical and overhead rider is available if you desire.

Please contact us if we can provide any further information.

Sincerely,

Franklin Engineering



Larry F. Dewberry, P.E.

Trial/deposition list for Larry F. Dewberry

Job #	Type of Job	P/D C/N	Client	D/Test	Job Location	Style of Case	Trial
1	98278 Lightning claim			2/2/01	DeFuniak Sprgs, FL	State of Florida v. Cook	
2	101041 Accident reconstruction	P	Douglas Dykes, Panama City, FL	4/19/01	Panama City, FL	Powell v. Water Street Seafood	
3	98185 Fire, electrical	P	Jeff Smith, Montgomery, AL	8/30/01	Wetumpka, AL	Smith v. E. M. Electric Co.	Yes
4	98049 Accident reconstruction	P	Edward Dean, Mobile, AL	9/5/01	Mobile, AL	Cooper v. Merritt	
5	100142 Accident reconstruction	D	James Garrett, Montgomery, AL	9/7/01	Pittsview, AL	Dobbs v. Don Taylor Logging	
6	100034 Fire, Electrical	P	Joel Pearson, Montgomery, AL	10/24/01	Dothan, AL	Auto Owners v. Donald Smith Co.	
7	101125 Accident reconstruction	D	Charles Wiggins, Pensacola, FL	11/14/01	Ponce De Leon, FL	State of Florida v. Ward	Yes
8	100240 Accident reconstruction	D	Jay Tuley, Montgomery, AL	1/30/02	Tallassee, AL	Nichols v. Anderson	
9	101104 Accident reconstruction	P	Mark Ulmer, Mobile, AL	4/26/02	Fairhope, AL	Blackwell v. Haisel	
10	101242 Accident reconstruction	D	Jay Tuley, Montgomery, AL	5/1/02	Montgomery, AL	Guthrie v. Byrd	
11	98262 Fire-Undetermined	N		6/18/02	Citronelle, AL	Reed v. Champion Home Builders	
12	97269 Fire, gas appliance	P	Hobart Hind, Tampa, FL	7/17/02	Pensacola, FL	Captain D's of Pensacola v. Commercial Appliance	Yes
13	102111 Accident reconstruction	D	Gordon Cherr, Tallahassee, FL	9/9/02	Perry, FL	Kemp v. Glombowski	
14	102019 Accident reconstruction	D	Broox Holmes, Mobile, AL	10/7/02	Pascagoula, MS	Kelly v. Cable South	
15	100117 Electric shock	D	Ken Hlison, Mobile, AL	10/29/02	Mobile, AL	Ward v. Carrigan	
16	98037 Accident reconstruction	D	Jim Newman, Mobile, AL	2/24/03	Chatom, AL	Thompson/Hicks v. Dorgan	Yes
17	101055 Fire, electrical	P	Scott Hunter, Mobile, AL	3/27/03	Mobile, AL	Glover v. Comfort Zone	
18	102210 Accident reconstruction	P	Mark Redditt, Mobile, AL	5/29/03	Mobile, AL	Meziano v. Road Shows, Inc.	
19	100156 Classroom trailer fire	P	Mark Dreyer, Panama City, FL	8/7/03	Panama City, FL	School Board of Bay County v. Wiley Electric	
20	97214 Accident reconstruction	D	John Kvartek, Pensacola, FL	9/4/03	Panama City, FL	McRary v. Baker	
21	103158 Accident reconstruction	P	Frank Myers, Tallahassee, FL	9/18/03	Tallahassee, FL	Assad v. Southeastern Truss	
22	100087 Accident reconstruction	D	Gary Shipman, Tallahassee, FL	9/22/03	Fountain, FL	Sombathay v. Food Giant	Yes
23	100024 Accident reconstruction	D	Jim Newman, Mobile, AL	10/13/03	Mobile, AL	Punches v. Thomas	Yes
24	103075 Accident reconstruction	D	Daryl Atchison, Mobile, AL	10/28/03	Mobile, AL	Delamore v. City of Mobile	
25	103144 Accident reconstruction	D	Jeff Farmer, Birmingham, AL	11/21/03	Tallassee, AL	Gant v. City of Tallassee	Yes
26	102200 Ladder accident	D	Bill Wright, Pensacola, FL	1/20/04	Cantonment, FL	Franklin v. Stoner	
27	104022 Fire	D	Mike Beers, Montgomery, AL	6/3/04	Evergreen, AL	Bricken v. South AL Buggy Works	
28	104166 Accident reconstruction	D	Tony Higgins, Montgomery, AL	11/23/04	Jackson Gap, AL	Elzey & Cooper v. Advanced Construction Services, Inc.	
29	101028 Fire-electrical	P	Stephan Freeman, Tampa, FL	12/17/04	FL Walton Bch, FL	Hall vs. Gulf Power	Yes
30	104292 Slip & fall	P	John Moneyham, Panama City, FL	2/7/05	Panama City, FL	Zahara v. Commercial Supply Co.	
31	104177 Accident reconstruction	P	Chris Peters, Mobile, AL	2/11/05	Mobile, AL	Fordon v. Crown Health Corp.	
32	105017 Accident reconstruction	P	Doug Dykes, Panama City, FL	4/27/05	Panama City Bch, FL	Tyner v. Beaumont	
33	103247 Accident reconstruction	D	Tommy Yearout, Birmingham, AL	8/4/05	Pensacola, FL	Covington v. Advance Auto Transport	
34	101059 Fire-torch	P	Bill Cam, Dothan, AL	11/22/05	Ozark, AL	Auto Owners v. Sanders Electrical & Plumbing	Yes
35	105199 Accident reconstruction	D	Rick Howard, Montgomery, AL	12/16/05	Fruithurst, AL	Champion v. Laminack	
36	104064 Fire	P	Elizabeth Herre, Atlanta, GA	12/21/05	Pensacola, FL	Maryland Casualty v. Bagby Electric	
37	103053 Fire	D	Bob Crabtree, Tallahassee, FL	3/3/06	Bonifay, FL	Weiss v. Saunders	Yes
38	105247 Accident reconstruction	D	Merrill Shirley, Elba, AL	3/13/06	Greenville, AL	Bohman v. Siegmund	
39	103195 Accident reconstruction	D	Joel Ramsey, Dothan, AL	4/11/06	Dothan, AL	Wornack v. Crittenden	
40	102230 Accident reconstruction	D	M. Meyer von Bremen, Albany, GA	4/20/06	Early County, GA	Musgrove v. Perdue Farms	
41	106059 Accident reconstruction	D	Jeff Farmer, Birmingham, AL	7/10/06	Fultondale, AL	Barnes v. Hammett	
42	106184 Accident reconstruction	P	Ralph Young, Florence, AL	10/4/06	Florence, AL	McClure v. Ponderosa Logging	
43	105312 Electric shock	D	Al Guemmer, Tampa, FL	11/8/06	Navarre, FL	Grooms v. Service Max Delivery	Yes
44	104237 Fire-hydraulic	D	Harold Mardenborough, Tallahassee	11/21/06	Tallahassee, FL	Briggs v. Alistare	
45	105101 Accident reconstruction	P	Will Phillips, Mobile, AL	11/27/06	Chicasaw, AL	Push v. Ortega	
46							
47							
48							
49							

FRANKLIN ENGINEERING

Franklin Technical Services, Inc

800-433-8539

Larry F. Dewberry, P.E.

(850) 763-2905
Fax (850) 872-8080
P.O. BOX 15894
PANAMA CITY, FL 32406

Florida P.E. #28503
Georgia P.E. #14512
Alabama P.E. #14606
Mississippi P.E. #12149

Education:

MSEE - 1973: Georgia Institute of Technology
BEE - 1971: Georgia Institute of Technology

Member:

Institute of Electrical and Electronic Engineers
Society of Automotive Engineers
National Fire Protection Association

Experience:

January, 1984 to Present: Senior Engineer, Franklin Engineering. Providing consulting services in the areas of failure analysis and reconstruction. Services are provided by myself and other consultants. My specialties are accident reconstruction, accident computer simulation, fire cause determination, and lightning damage analysis.

May, 1977 to January, 1984: Manager, Swimmer Delivery Vehicle (SDV) electronic and electrical subsystems, Naval Coastal Systems Center (NCSC), Panama City, Florida. Responsible for the design, production, and documentation of all electrical and electronic subsystems used in the SDV program. Other responsibilities included acting as the Federal government technical representative during contract performance and serving as a consultant to other Naval activities.

July, 1974 to May, 1977: Electronic engineer, NCSC, for MK11 underwater breathing apparatus. Responsibilities included design, development, and configuration control of communication and life support monitoring equipment. Developmental work resulted in my being issued Patent Nos. 4013992 and 4164981.

July, 1973 to June, 1974: Electronic engineer, NCSC. Developed computer simulation and conceptual design of underwater vehicle control systems. Co-authored the

Larry F. Dewberry, P.E. Page 2

published report, "The Analysis of Longitudinal Control Systems for Underwater Vehicles", which detailed the results of this project.

June, 1972 to June, 1973: Graduate student at Georgia Institute of Technology; graduate research assistant for Dr. M. Milner. Developed monitoring system for measurement of human nerve impulses during normal walking. Graduated Master of Science Electrical Engineering.

March, 1971 to May, 1972: Field engineer, Schlumberger Offshore Services. Performed electronic measurements on exploration offshore drilling platforms to evaluate presence of oil or gas. Supervised two or three technicians and interpreted the results of the tests.

June, 1969 to March 1971: Undergraduate at Georgia Institute of Technology. Graduated, Bachelor of Electrical Engineering.

March, 1969 to June, 1969: Substation test helper, Georgia Power Company. Assisted test engineers in inspection of the instrumentation, transformers, and circuit breakers in power distribution substations.

April, 1967 to March, 1969: Specialist 5th Class, Calibration Technician, U.S. Army. Calibrated and repaired electronic and physical measuring devices. Tour of duty included six months training in the United States followed by 17 months overseas in Thailand, Vietnam, Taiwan, and Okinawa.

September, 1964 to January 1967: Undergraduate, Georgia Institute of Technology. Drafted into U.S. Army during sophomore year.

Personal Data:

Date/Place of Birth: January 18, 1946; Bremen, Georgia

Height: 5'6"

Weight: 145 lbs.

Caucasian

Marital Status: Married to Sarah B. Dewberry

Children:

Timothy F. Dewberry, born December 6, 1983

Julie A. Dewberry, born November 14, 1985